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March 3, 1998

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, DC 20554

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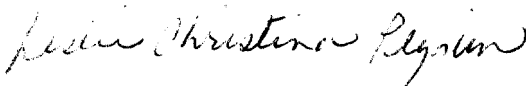
Dear Ms. Salas:

**Re: CCD No. 96-128; In the Matter of Implementation of the Pay Telephone  
Reclassification and Compensation Provisions of the Telecommunications  
Act of 1996**

Enclosed for filing in the above captioned matter are an original and four (4) copies of a Petition of Forty-Seven Companies for Waiver of the Implementation Date for Payphone Specific Coding Digits. We trust that the enclosed will be found in order for filing and grant. We have also enclosed one copy to be stamped and returned in the enclosed self-addressed stamped envelope.

Should you require any further information, or have any questions regarding this filing, please call either Jeff Smith or Jack Pendleton at (503) 624-7075<sup>1</sup> or Chris Pilgrim at (719) 594-5828.

Sincerely,

  
Leslie Christina Pilgrim

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Enclosures

cc: Service List

<sup>1</sup> After March 27, Mr. Smith and Mr. Pendleton's number will be 503-612-4400.

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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In the Matter of )  
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Implementation of the Pay Telephone )  
Reclassification and Compensation )  
Provisions of the Telecommunications Act )  
of 1996 )

CC Docket No. 96-128

PETITION OF FORTY -SEVEN(47) LOCAL EXCHANGE CARRIERS FOR  
WAIVER OF THE MARCH 9, 1998 IMPLEMENTATION  
DATE FOR TRANSMITTING PAYPHONE CODING DIGITS

GVNW, Inc./Management  
2270 LaMontana Way  
Colorado Springs, Colorado 80918

Date Submitted: March 3, 1998

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### Attachments:

Attachment A- List of Local Exchange Carriers that require additional time to provide FLEX ANI for transmitting payphone coding digits

Attachment B - List of Local Exchange Carriers that intend to use LIDB for transmitting payphone coding digits

Attachment C - List of Local Exchange Carriers that are non-equal access for some or all of their access lines and are thus not capable of FLEX ANI or LIDB for those lines at the present time

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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In the Matter of )  
)  
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Implementation of the Pay Telephone )

Reclassification and Compensation )

Provisions of the Telecommunications Act )  
of 1996 )

CC Docket No. 96-128

PETITION OF LOCAL EXCHANGE CARRIERS FOR WAIVER OF THE MARCH 9,  
1998 IMPLEMENTATION  
DATE FOR TRANSMITTING PAYPHONE CODING DIGITS

**I. Introduction**

Forty-seven (47) local exchange telephone companies ("the Companies")<sup>1</sup>, by their consultant, hereby request a waiver of the requirement that all Local Exchange Carriers ("LECs") transmit payphone coding digits by March 9, 1998.<sup>2</sup> Each of the petitioners was anticipating that the Commission would be providing additional guidance on related payphone issues prior to the filing of this request for waiver. With only one week to go before the March 9 date, this further guidance has not yet been released. Thus, these waiver requests are being made, in the event that the Commission does not issue further orders specific to payphone coding digits prior to March 9, 1998, for the following reasons: 1) in some cases, companies need additional time to implement a

<sup>1</sup> The LECs are listed on the cover sheets of Attachments A, B, and C.

<sup>2</sup> *In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket 96-128, Order at para. 2 (rel. October 7, 1997). (hereafter October 7, 1997 Order)

FLEX ANI option (see Attachment A); 2) in some cases, companies have implemented a LIDB approach and would require a waiver if the Commission mandates FLEX ANI as the only allowed means for the LECs to transmit the payphone specific coding digits required by the Payphone Orders (Attachment B); and 3) companies that have some or all of their payphone lines in a non-equal access environment still await the Commission's guidance as stated in paragraph 15 of the Commission's October 7, 1997 Order<sup>3</sup> (Attachment C).

The Companies will show good cause that a waiver of the Commission's Order is necessary, appropriate, and is in the public interest. The purpose of the instant petition is to demonstrate that the granting by this Commission of the requested relief is in the public interest.

Section 1.3 of the Federal Communications Commission's rules permits (the Commission) to authorize a waiver of its rules "if good cause is therefore shown."<sup>4</sup> A waiver of the Federal Communications Commission's rules is appropriate if special circumstances warrant a deviation from the general rule<sup>5</sup> and such a deviation will serve the public interest.

## **II. Background**

In the *Payphone Orders*, the Commission imposed a requirement that by October 7, 1997, LECs provide payphone-specific coding digits to payphone service providers

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<sup>3</sup> October 7, 1997 Order, paragraph 15.

<sup>4</sup> 47 C.F.R. § 1.3

<sup>5</sup> Northeast Cellular Tel. Co. v. FCC, 897 F.2d 1164, 1166 (D.C. Cir. 1990), WAIT Radio v. FCC, 418 F.2d 1153 (D.C. Cir. 1969).

(PSPs), and that PSPs provide those digits from their payphones to interexchange carriers (IXCs).<sup>6</sup> On its own motion on October 7, 1997, the FCC granted a limited waiver of five months, until March 9, 1998, to those LECs and PSPs that cannot provide payphone-specific digits as required by the *Payphone Orders*.

Prior to the FCC granting a waiver, on September 30, 1997, USTA filed its petition for waiver, "requesting a waiver or declaratory Order of the Commission's Order in this proceeding such that local exchange carriers ("LECs") may use existing technologies and methods to provide coding digits that identify payphone calls."<sup>7</sup> Currently, two alternatives are available to LECs: 1) FLEX ANI and 2) LIDB. Either of these alternatives satisfy the requirement to transmit the payphone specific coding digits so IXCs have a means to track the compensable calls.

At the heart of the issue is the vehicle to be used by LECs when transmitting payphone coding digits. The issue of the transmission technology has not been clarified as the IXCs advocate that all LECs should use FLEX ANI in their apparent desire to avoid the query charges that are inherent in the LIDB option. As pointed out in USTA's petition (page 1), "*controversy has been generated in the LEC, IXC, and PSPs industries by varying interpretations of the Commission's Payphone Orders regarding the obligation of LECs to provide coding digits that are then used by IXCs to track payphone calls to compensate PSPs.*" This uncertainty has delayed changes and timing for the

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<sup>6</sup> See *Report and Order*, 11 FCC Rcd at 20.691 paras 98-99, *Order on Reconsideration* 11 FCC Rcd at 2165-66 para 64 and 21.278-80 paras 93-99.

<sup>7</sup> Petition for Waiver of the United States Telephone Association, filed Sept. 30, 1997.

petitioning small companies because they have been working under the premise that either LIDB or FLEX ANI will satisfy the transmission requirement.

### **III. A Waiver of the Commission Rules is Necessary and in the Public Interest**

#### Waivers are needed for differing sets of circumstances

For the petitioning LECs, there are three sets of circumstances at present. To this point, the petitioners have concluded that both FLEX ANI and LIDB technologies are permissible options to meet the payphone coding digit requirements. Recently, industry discussions have indicated that the use of FLEX ANI may be mandated. This creates a variety of problems for the petitioning companies as the technical and financial ability of these LECs to provide payphone-specific information for per-call tracking purposes varies from company to company. Resolution of the controversy surrounding the method prescribed to pass the coding digits is crucial to the petitioning Companies. Small companies are faced with balancing the needs of their IXC customers with implementing cost effective network requirements.

In the three attachments, the petitioners have been placed in three groups based on the nature of the relief requested. Attachment A includes LECs that are pursuing a FLEX ANI solution, but will not be ready by March 9, 1998. Attachment B lists LECs for which a LIDB approach proves to be the economically prudent technology. Attachment C includes companies that possess access lines that are in a non-equal access environment.

**ATTACHMENT A DISCUSSES LOCAL EXCHANGE CARRIERS THAT  
REQUIRE ADDITIONAL TIME TO PROVIDE FLEX ANI FOR  
TRANSMITTING PAYPHONE CODING DIGITS**

For those with FLEX ANI capability, the high cost relative to the number of payphones has delayed its implementation. In this regard, petitioners cite the experience of other LECs that the Commission itself noted in a related proceeding.<sup>8</sup> As included in the footnote cited, the Commission notes the experience of the following carriers:

*Ameritech maintains that it has installed Flex ANI in 400 of its 671 end offices, but has received only 34 requests for OLS services all from the same interexchange carrier...PRTC contends that it has installed Flex ANI in 7 of its 32 central offices and has not yet received a single request for OLS service. Likewise, Bell South maintains that it has converted 752 of 880 of its end office switches to provide Flex ANI, but it has never received a request for OLS service...NYNEX requests a waiver of the requirement for 68 non-digital switches that are nearly all scheduled to be replaced within the next two years. NYNEX claims that because it has not received any orders for OLS service on these switches, the alleged \$1.2 million cost of installing Flex ANI on these switches outweighs any expected benefits.*

**The FCC has established a precedent of granting additional time in related matters**

In a number of prior decisions, the Commission has granted extensions of time to local exchange carriers when circumstances warrant such an extension. In the Local Number Portability docket<sup>9</sup>, the Commission has committed to reducing regulatory burdens on small telephone companies.

In this instant petition, such an extension is warranted and consistent with Commission precedent recognizing the technical and economic burdens imposed on

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<sup>8</sup> Memorandum Opinion and Order, CC Docket No. 91-35; FCC DA 96-2169 (rel. December 20, 1996); footnote 17.

<sup>9</sup> Telephone Number Portability, Second Report and Order, CC Docket No. 95-116; FCC 97-289 (rel. Aug. 18, 1997).



small and rural LECs in implementing software upgrades. In earlier situations<sup>10</sup>, the Commission has granted waivers when such burdens have been demonstrated, as Petitioners have done here in this instant petition and related attachments.

**ATTACHMENT B LISTS LOCAL EXCHANGE CARRIERS THAT INTEND TO  
USE LIDB FOR TRANSMITTING PAYPHONE CODING DIGITS**

**The Commission itself endorsed LIDB in a related proceeding**

In some cases, FLEX ANI is not resident in the switch so that it could be activated by the LEC. Where the switch does not have this inherent capability, the Company is left with either upgrading the current switch software generic or replacing the switch in its entirety, both costly alternatives for the number of payphones involved. In a related payphone docket the FCC noted, *"that while it is technically feasible to add FLEX ANI to most, if not all, LEC end offices, adding this technology to all such end offices can entail significant expenditures."*<sup>11</sup>

**The Act requires technologically neutral network solutions**

The petitioning companies should not be required to shoulder the technical, financial and administrative burdens of providing a specific form of payphone coding information such as FLEX ANI when alternative technologies such as LIDB are available and meet the per-call tracking obligations of the IXCs. The intent of the Telecommunications Act of 1996 is that the implementation of services be done on a competitively and

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<sup>10</sup> E.G., Rules and Policies Regarding Calling Number Identification Service - Caller ID, Order and Fourth Notice of Proposed Rulemaking, CC Docket No. 91-281, 10 FCC Rcd 13796, 13808 (1995) (Caller ID Order).

<sup>11</sup> *Memorandum Opinion and Order*, CC Docket NO. 91-35, released December 20, 1996, at para.8.

technologically neutral basis. Imposing a technology to solely relieve the IXC's from paying a nominal query charge does not meet with the intent of the Act.

Attachment B serves to illustrate the activation/switch replacement costs the Companies will experience should they be mandated to implement a FLEX ANI method.

The small companies listed in Attachment B weighed their best alternatives to meet the FCC's transmission requirement. To implement a technology such as FLEX ANI for the sole purpose of transmitting payphone specific digits to IXC's is the antithesis of prudent public policy for these small companies. For these reasons, it is prudent for the Companies to seek a waiver that allows them to use a technology that is conducive to their current network configurations and minimizes capital expenditures. This serves in the interest of the public while allowing the Companies to comply with the FCC's Order of transmitting payphone specific coding digits.

Additionally, in other Commission matters<sup>12</sup>, the Commission has committed to reducing regulatory burdens on small telephone companies. Granting this waiver request for Petitioners is consistent with this objective. Grant of this waiver provides for the ongoing compliance with the order using a technology that accomplishes the same result as FLEX ANI. For the petitioning Companies, LIDB is a cost effective

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<sup>12</sup> Amendment of the Commission's Rules to Establish Competitive Service Safeguards for Local Exchange Carrier Provision of Commercial Mobile Radio Services, Implementation of Section 601(d) of the Telecommunications Act of 1996, WT Docket No. 96-162, FCC 97-352 (rel. Oct. 3, 1997)

means of complying with the FCC's transmission requirement. LIDB provides a company wide implementation whereas FLEX ANI is installed one end office at a time.

**ATTACHMENT C LISTS LOCAL EXCHANGE CARRIERS THAT ARE NON-EQUAL ACCESS FOR SOME OR ALL OF THEIR ACCESS LINES AND ARE THUS NOT CAPABLE OF FLEX ANI OR LIDB FOR THOSE LINES AT THE PRESENT TIME**

The Commission has yet to address in a separate order<sup>13</sup> the issues raised by parties regarding the provision of payphone-specific coding digits by non-equal access switches. Nonetheless, the petitioners listed in Attachment C provide additional company-specific factual circumstances indicating that the costs for such switches to be FLEX ANI capable are prohibitive.

**IV. Conclusion**


The petitioners request the Commission provide clarification on the issues raised in the relevant USTA petition. Absent clarification, petitioners believe that they are in compliance with a reasonable interpretation of the record to date. The impact of an

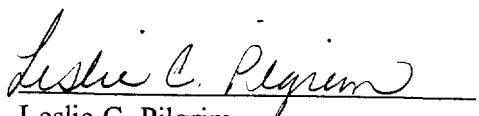
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<sup>13</sup> The Commission had indicated intent in this regard in the October 7, 1997 Order at paragraph 15.

extension of the deadline or ability to implement a technologically neutral solution on other parties does not outweigh the burden that would be imposed on any of the petitioners by a denial of the request. The Companies submit that the public interest will be better served by these waivers and that grant of the relief requested in this petition and its attachments would be consistent with the policies underlying these rules. Good cause having been shown, the Companies respectfully request the Commission grant each petitioner the specific relief as so stated in the attachments and grant such other and further relief as may be proper in the premises.

Respectfully submitted,

  
Jeffrey H. Smith / Jack B. Pendleton  
GVNW Inc./Management- Oregon Office

  
Leslie C. Pilgrim  
GVNW Inc./Management- Colorado Office

## **SERVICE LIST**

A. Richard Metzger, Chief  
Common Carrier Bureau  
Federal Communications Commission  
1919 M. Street, NW  
Room 500  
Washington, DC 20554

Geraldine Matise, Chief  
Network Services Division  
Common Carrier Bureau  
Federal Communications Commission  
2000 M Street, NW  
Room 235  
Washington, DC 20554

Kris Monteith, Esq.  
Network Services Division  
Common Carrier Bureau  
Federal Communications Commission  
2000 M Street, NW  
Room 235  
Washington, DC 20554

## ATTACHMENT A

### LIST OF LOCAL EXCHANGE CARRIERS THAT REQUIRE ADDITIONAL TIME TO PROVIDE FLEX ANI FOR TRANSMITTING PAYPHONE CODING DIGITS

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Lathrop Telephone Company	16
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Leonore Mutual Telephone Company	18
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Peoples Telephone Company	22
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## **ATTACHMENT A**

### **Adams Telephone Cooperative**

Adams Telephone Cooperative, ("Adams"), serves approximately 4,100 rural customers in the state of Illinois. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 2,200 access lines, with 20 payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

An SS7 based solution is currently available through the LIDB provider. Implementing a LIDB solution would enable the company to transmit the appropriate payphone coding digits by March 9, 1998. The company currently is in the process of upgrading its switching capabilities, and upon completion, will be able to offer FLEX ANI service to its payphone service providers. The company anticipates completion of this upgrade by mid 1998.

Imposing an interim software upgrade specifically for transmitting payphone digits does not serve in the public interest, especially when the company is near completion of its switch upgrade plans and an alternate means is available and accomplishes the same goal while completion is underway. While we believe that the record in this proceeding to date would indicate our compliance, this waiver is being requested in the event that the FCC mandates FLEX ANI as the only option.

## ATTACHMENT A

### **Albion Telephone Company, Inc.**

Albion Telephone Company, Inc., ("Albion"), serves rural customers in Idaho. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP, as only six (6) of the eleven (11) switches are currently capable of transmitting payphone coding digits via FLEX ANI. There are approximately 1,000 access lines in service, of which only 16 are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

In its Petition for Waiver of the January 1, 1998, implementation date of 4 digit CIC, Albion explained it was in the process of implementing a host/remote network configuration throughout its operating territory.<sup>1</sup> To date, there are five remaining switches currently being converted to remote switches that are not technically capable of either 4-digit CIC or FLEX ANI. Installation and conversion of these five switches will be completed by June 30, 1998.

Based on the aforementioned information, Albion respectfully requests a waiver until June 30, 1998, which will correspond with the existing extension granted by the FCC.<sup>2</sup>

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<sup>1</sup> *Petition of Albion Telephone Company, Inc. for Waiver of the January 1, 1998 Implementation Date for 4-Digit CIC*, filed December 5, 1998.

<sup>2</sup> *Petitions for Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule of Several Companies*, NSD File Nos. 97-74; 97-63; 97-78; 97-75; 97-66; 97-67; 97-65; 97-68; 97-73; 97-70; 97-72; 97-76; 97-64; 97-71; 97-69, Order released 12/24/97, DA 97-2691.



## **ATTACHMENT A**

### **Cascade Utilities, Inc.**

Cascade Utilities, Inc., ("Cascade"), serves rural customers in Oregon. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 9,300 access lines in service, of which 84 are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

The FLEX ANI solution will require a software upgrade with an estimated cost of \$15,000. Cascade anticipates FLEX ANI being operational by December 31, 1998.

Based on the aforementioned, Cascade respectfully requests a waiver until December 31, 1998, to complete its software upgrade and provide payphone coding digits via FLEX ANI.

## **ATTACHMENT A**

### **Cass County Telephone Company**

Cass County Telephone Company, ("Cass"), serves rural customers in Illinois. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 3,080 access lines in service, of which only nine (9) are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

An SS7 solution is not available at this time, therefore Cass must consider the FLEX ANI solution. The FLEX ANI solution will require a software upgrade with an estimated cost of \$4,500. Due to economic constraints, Cass has not pursued implementing FLEX ANI until this time. Cass anticipates FLEX ANI becoming operational by September 30, 1998.

Based on the aforementioned, Cass respectfully requests a waiver until September 30, 1998, to complete its software upgrade and provide payphone coding digits via FLEX ANI.

## **ATTACHMENT A**

### **Chickamauga Telephone Corporation**

Chickamauga Telephone Corporation ("Chickamauga"), serves rural customers in Georgia. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 6,200 access lines, of which 38 are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998

Chickamauga does not have either FLEX ANI or an SS7 solution available at this time. The FLEX ANI solution will require a software upgrade with an estimated cost of \$22,880. Economic constraints have prevented the company from implementing either alternative. Chickamauga anticipates FLEX ANI becoming operational by September 30, 1999.

Imposing a software upgrade specifically for transmitting payphone digits will impose an economic hardship on the company which does not serve the public interest. Based on the aforementioned, Chickamuaga respectfully requests a waiver until September 30, 1999, to complete its software upgrade and provide payphone coding digits via FLEX ANI.

## **ATTACHMENT A**

### **Emery Telephone Company**

Emery Telephone Company, ("Emery"), serves rural customers in Utah. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 4,500 access lines in service, of which 89 are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

Emery is in the process of replacing its existing Stromberg-Carlson DCOs with a new Stromberg-Carlson EWSD host/remote network. The existing DCOs are not capable of FLEX ANI. The existing switch would require a patch level upgrade at an estimated cost of \$5,200 in order to provide FLEX ANI. It would be sixty (60) days from the date ordered before the function would be operational. Emery is undergoing a switch replacement and will have the FLEX ANI inherent with the new switches. Emery determined it was not economical to install a patch. Emery's target completion date of the new network is third quarter 1998.

Based on the aforementioned information, Emery respectfully requests a waiver until October 1, 1998, to complete its network upgrade and provide payphone coding digits via FLEX ANI.

## **ATTACHMENT A**

### **ENMR Telephone Cooperative**

ENMR Telephone Cooperative ("ENMR"), serves rural customers in New Mexico. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 12,200 access lines in service, of which 228 are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

ENMR is in the process of implementing its \$4 million modernization plan that provides an efficient host/remote configuration that will enable the company to pass 4-digit CIC and 7-digit CAC, as well as FLEX ANI. To date ENMR has completed a portion of its plan which allows approximately 5,000 lines to pass FLEX ANI. The remaining 7,000 lines are in the process of being upgrading. ENMR filed a request for an extension to provide 4-digit CIC and 7 digit CAC, to which the FCC granted ENMR an extension to June 30, 1998 to complete its modernization.<sup>3</sup>

Based on the aforementioned, ENMR respectfully requests a waiver until June 30, 1998, which will correspond with the existing extension granted by the FCC.

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<sup>3</sup> *Petitions for Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule of Several Companies, NSD File Nos. 97-74; 97-63; 97-78; 97-75; 97-66; 97-67; 97-65; 97-68; 97-73; 97-70; 97-72; 97-76; 97-64; 97-71; 97-69, Order released 12/24/97, DA 97-2691.*

## **ATTACHMENT A**

### **Farmers Telephone Company, Inc.**

Farmers Telephone Company, Inc., ("Farmers"), serves rural customers in Colorado. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 400 access lines in service, of which three (3) are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

Farmers is currently in the process of replacing its switch, which did not have either FLEX ANI or SS7 capability. The new switch will have both SS7 and FLEX ANI capability. It is anticipated the switch will be operational September 30, 1998, at which time the FLEX ANI capability will be functional.

Based on the aforementioned information, Farmers respectfully requests a waiver until September 30, 1998, to complete its switch replacement and provide payphone coding digits via FLEX ANI.

## **ATTACHMENT A**

### **Flat Rock Telephone Company**

Flat Rock Telephone Company, ("Flat Rock"), serves rural customers in Illinois. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 536 access lines in service, of which there are 2 payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

An SS7 solution is not available at this time, therefore Flat Rock must consider the FLEX ANI solution. The FLEX ANI solution will require a software upgrade with an estimated cost of \$4,180. Due to economic constraints, Flat Rock has not pursued implementing FLEX ANI until this time. Flat Rock anticipates FLEX ANI becoming operational by March 31, 1999.

Based on the aforementioned information, Flat Rock respectfully requests a waiver until March 31, 1999, to complete its software upgrade and provide payphone coding digits via FLEX ANI.

## **ATTACHMENT A**

### **Fulton Telephone Company**

Fulton Telephone Company, ("Fulton"), serves rural customers in Mississippi. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 8,500 access lines in service, of which there are 15 payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

An SS7 solution is not available at this time, therefore Fulton must consider the FLEX ANI solution. The FLEX ANI solution will require a software upgrade and the estimated cost of \$30,000. Economic constraints have prevented the company from completing either alternatives. Fulton anticipates FLEX ANI becoming operational by March 31, 1999.

Based on the aforementioned information, Fulton respectfully requests a waiver until March 31, 1999, to complete its software upgrade and provide payphone coding digits via FLEX ANI.



## **ATTACHMENT A**

### **Grand River Mutual Telephone Corporation**

Grand River Mutual Telephone Corporation, ("Grand River"), serves rural customers in Iowa and Missouri. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 20,500 total access lines in Grand River's operating territory. Of that total only 12 payphone lines (11 in Missouri and 1 in Iowa) will not be capable of transmitting FLEX ANI by March 9, 1998.

Grand River's intent is to provide payphone coding digits via FLEX ANI. Currently, Grand River is in the process implementing a host/remote network configuration, of which 34 of 44 switches are being converted and will be capable of providing FLEX ANI by June 1, 1998. These switches were originally scheduled to be operational by March 9, 1998, however, due to a recent fiber cut SS7 signaling was lost impacting the local switching capability. As a result of this fiber cut, Grand River must conduct additional testing to determine if any switching and/or signaling improvements to the new switch will be necessary.

The ten (10) remaining switches are to be converted no later than March 31, 1999. The switches that will not be capable of FLEX ANI until 1999 are as follows: Conception Junction, MO (host switch), with the Missouri subtending remotes of Ravenwood, Sheridan , Parnell, Denver, Gentry, Darlington, Barnard, and one subtending remote in Blockton, Iowa.